

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

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In re:

**Case No.: 08-35653-KRH
Chapter 11**

CIRCUIT CITY STORES, INC., et al.

Debtors.

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**MOTION FOR ADMISSION
PRO HAC VICE OF JOSEPH D. FRANK**

Augustus C. Epps, Jr. ("Movant"), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Joseph D. Frank of Frank/Gecker LLP, Chicago, Illinois ("Mr. Frank") to appear *pro hac vice* in the above-captioned case presently pending before the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Case") to represent the interests of several defendants named in adversary proceedings pending in the Bankruptcy Case. In support of this Motion, Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

Augustus C. Epps, Jr. (VSB No. 13254)
Michael D. Mueller (VSB No. 38216)
Jennifer M. McLemore (VSB No. 47164)
Whitney R. Travis (VSB No. 79759)
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2. Mr. Frank is a member in good standing of the State Bar of Illinois. There are no disciplinary proceedings pending against Mr. Frank in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Frank to file pleadings, to appear and be heard at hearings, and otherwise to participate in the Bankruptcy Case and all related adversary proceedings.

4. Movant and his law firm shall serve as co-counsel with Mr. Frank.

5. Mr. Frank's Application is appended to and incorporated by reference into this Motion.

6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Joseph D. Frank to appear *pro hac vice* in the Bankruptcy Case and all related adversary proceedings and granting Movant such other and further relief as is just.

/s/ Augustus C. Epps, Jr.

Augustus C. Epps, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of January, 2011, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Joseph D. Frank was served on all persons receiving electronic notice in these cases and to the following:

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/s/ Augustus C. Epps, Jr.
Augustus C. Epps, Jr.

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